

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED

2014 SEP 16 AM 11:14

In re:) Chapter 9
)
) Case No. 13-53846
CITY OF DETROIT, MICHIGAN,)
) Hon. Steven W. Rhodes
)
Debtor.)

**EX PARTE MOTION OF MARVIN SEALES FOR LEAVE TO FILE RESPONSE TO
DEBTOR'S SIXTH OMNIBUS OBJECTION TO CERTAIN
CLAIMS IN THE TRADITIONAL MANNER**

Now comes MARVIN SEALES, by and through his undersigned counsel, and for his *Ex Parte* Motion for Leave to File Response to the Debtors' Sixth Omnibus Objection to Certain Claims in the Traditional Manner respectfully states as follows:

1. Marvin Seales filed a Proof of Claim in this action, which has been designated Claim Number 3631.
2. Debtor filed its Sixth Omnibus Objection to Certain Claims (Docket #7197) ("Objection") on August 29, 2014, and included Mr. Seales' claim on its list of claims it seeks to have disallowed.
3. Counsel for Mr. Seales understands that represented parties are to electronically file a response to the Debtor's Objection; however, undersigned counsel for Mr. Seales does not have an ECF login and/or password for the United States Bankruptcy Court for the Eastern District of Michigan.
4. According to the Court's website, the next registration class for ECF filing for creditor attorneys is October 9, 2014.

5. Mr. Seales opposes the disallowance of his claim, and his Response to the Debtors' Objection to his claim must be filed by September 24, 2014.


6. Therefore, Mr. Seales respectfully requests that this Court grant him permission to file his response to the Debtor's Objection to his claim in the traditional manner.

7. Mr. Seales is filing said Response contemporaneously with this Motion, and a Proposed Order.

WHEREFORE, MARVIN SEALES respectfully requests that the Court GRANT his Motion for Leave to File Response to Debtor's Objection in the Traditional Manner.

Respectfully submitted,

FIEGER, FIEGER, KENNEY, GIROUX & HARRINGTON, P.C.



GEOFFREY N. FIEGER (P30441)
JAMES S. CRAIG (P52691)
Attorneys for Marvin Seales
19390 W. Ten Mile Road
Southfield, MI 48075
(248) 355-5555

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